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Engagement Team
ERA Planning and Environment
Level 1, 125A Elizabeth St nipaluna (Hobart)

By email to: engagement@eraplanning.com.au

Re: Improving residential standards in Tasmania: Discussion paper

Dear ERA Planning and Environment,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank you for the opportunity to provide feedback on the *Improving residential standards in Tasmania: Discussion paper* being developed for the State Planning Office.

Overall, the discussion paper is well-researched and presents significant findings and information in a clear-to-digest manner, aided through tables and diagrams.

Overall, the Institute supports the directions for residential standards for planning proposed in the discussion paper. Our comments below in response to the consultation questions in the discussion paper result from a dedicated roundtable consultation undertaken with our Tasmanian Chapter members.

The Institute supports changes to planning in the state that will enable the supply of housing for those who need it and encourages greater housing diversity and good design, along with improving decision-making systems and strategies. Increasing housing density in appropriate areas is a crucial component of this, and we refer to the Institute's Multi-Residential Standards Policy, and Affordable Housing Policy¹ to support our response. We also engage with this issue extensively in other states and territories. Good design enables healthy, sustainable and liveable communities, and should be at the core of all standards.

We are not achieving housing density targets. While planning reforms may encourage change in some ways, it is critical to look at the reasons that private developers choose to develop single detached dwellings on greenfield sites at the periphery of settlements, rather than at higher

¹ Australian Institute of Architects, 'Multi-Residential Standards Policy', May 2017: www.architecture.com.au/wp-content/uploads/Multi-Residential-Standards-Policy.pdf; Australian Institute of Architects, 'Affordable Housing Policy', May 2017: www.architecture.com.au/wp-content/uploads/Affordable-Housing-Policy.pdf.

densities on brownfield sites, closer to settlement centres. Relying on private development acting alone is unlikely to deliver the quality-designed, higher-density development that is required by housing density targets. New models, that may be government-lead, including partnerships with the development sector, should be considered if meaningful impact for Tasmanians is to be realised.

Survey Questions 1 + 2: Feedback Opportunity

- Does the housing profile described align with your professional or community experience in Tasmania? Consider the housing profile as it relates to your location or industry.
- Are there other important matters the Project needs to consider in terms of Tasmania's current and future housing profile?

The housing profile described does align with the Institute's professional and community experience in Tasmania. We note the data that has been collated to inform this discussion.

In terms of Tasmania's current and future housing profile, the discussion paper has considered matters of a gradually ageing population in Tasmania and the proportion of single (lone) person households in the across the whole population. It is important to also consider:

- the age break-down according to dwelling type and household composition
- other population attributes such as the presence of a disability and related issues such as mobility impairment

Ideally this information should be spatially resolved. This information can be extracted from Australia Bureau of Statistics (ABS) census data cubes. The presence of a disability and types of impairment are available through the ABS' Survey of Disability Ageing and Carers² which is undertaken every three to four years.

This more highly resolved information can then enable a more comprehensive understanding of whether the provisioning of dwellings is well matched with population needs. Single person households may comprise older adults but can also comprise young people or students. Where there are greater proportions of single older adults, or single people living with a disability including mobility impairment, questions might then be raised about the suitability and location of the dwellings for their needs.

As the discussion paper alludes, dwellings might not be well-matched to overall population needs. Local Planning Schedules together with better resolved land use definitions, discussed elsewhere, may allow for much more targeted and specified planning of residential land use types in local precincts such as student or older person's housing located close to transport and amenities.

It is also useful to consider what might make living in higher-density dwellings more appealing, which may extend further than planning provisions; for example, ensuring that occupants are able to have pets in strata-titled development. High-quality, high-density developments that appeal to 'empty nesters' should also be considered, along with the impact of short-stay accommodation.

It is apparent that housing density is falling short of targets, and while planning reforms may be able encourage change in some ways, it is critical to look at the reasons that private developers

² <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release>

choose to develop single detached dwellings on greenfield sites at the periphery of settlements, rather at higher densities on brownfield sites, closer to settlement centres.

Survey Questions 3 + 4: Feedback Opportunity

- Does the demand and supply discussion align with your professional or community experience in Tasmania? Consider housing demand and supply as it relates to your location or industry.
- What location or industry-specific issues should be considered in the demand and supply discussion?

The supply and demand discussion does match the Institute’s professional community experience. The level of detail here is helpful, especially the statistics on short-stay accommodation, as well as the difficulties highlighted around achieving robust data collection due to the data supplied by Councils.

In relation to the planning principles for housing as outlined on page 8, the Institute would like to comment on Strategy 6: Foster good design and sustainability. The Institute is supportive of this strategy, however, would suggest expanding on the intended outcome to the following:

Planning codes and assessment pathways promote housing which satisfies occupant and wider community needs, is of high-quality design and construction, and delivers best value for money over the lifecycle of the project. Housing should provide benefits and positive outcomes for the residents, the wider community and environment, and incorporate sustainable design principles.

The Institute supports the United Nations Sustainable Development Goals, as articulated in a submission the Tasmanian Chapter made in 2023 to Sustainability Tasmania.³

The discussion about supply and demand must be addressed through a more thorough consideration of how the Tasmanian Government and local governments resolve to respond to population and settlement issues. Minimisation of urban sprawl is crucial for future of our state, to ensure preservation of our natural environment and agricultural land, while also ensuring residents have access to services and amenities, and keeping costs down for both residents and government alike.

Strategic planning and a settlement policy needs to be developed for Tasmania to ensure that there is appropriate and suitable housing and density in the right place, with appropriate infrastructure and services to support it, while also allowing for urban food bowls, nature reserves and public open space for future residents. Strategic planning would also provide more certainty for developers.

The Institute observes a struggle across all communities in Australia. On one hand outer urban expansion provides the easier pathway to deliver needed housing as achieving planning approval may not be constrained as much by local neighbourhood character (as a neighbourhood does not yet exist), difficult sites, and premium land prices against which returns must be generated.

³ https://www.architecture.com.au/wp-content/uploads/Response-from-Institute-of-Architects_SustainableTasmania_Oct-2023.pdf

This makes it more appealing to developers, as opposed to utilising more centralised brownfield sites that are often more difficult to develop.

Because of these reasons, current reliance on the private sector is not meeting housing density targets. In the long-term, it is more cost-effective – when consideration is given to the cost of extending and upgrading roads, infrastructure and public amenity such as schools, along with user costs including transport to and from outer suburbs – to house people more centrally. New models, such as that of Development WA, as summarised in *Improving residential standards in Tasmania: Case studies*, should be considered for meaningful impact to be realised.

Survey Question 5: Feedback Opportunity

- Does the drafting and assessment discussion align with your professional or community experience in Tasmania?

The discussion on drafting and assessment is consistent with issues perceived by the Institute impacting the profession and the community. The Tasmanian Chapter agrees with the discussion paper’s positions on assessment approaches, in particular, the issues with minimum requirements versus performance-based standards, and trade-off approaches.

We agree that while minimum requirements can provide certainty and can sometimes be more easily measured, it may reduce the opportunity to achieve high quality and innovative design outcomes. High quality design outcomes are more likely to be achieved by mandating the use of registered architects, which is currently only required when building areas exceed 2000m² and three-storeys. Other factors such as procurement methods, and planning and design factors (sometimes negotiated as trade-offs in return for gross floor area uplifts) also impact outcomes. Planning and design factors may include returns of public open space, building setbacks and high quality and durable facades and activation at the street level that then not only improve outcomes for occupants but also neighbourhoods. It is qualified and experienced architects who will work with their clients to achieve these outcomes.

Prescriptive versus performance-based approaches need to be considered together with the assessment used. The discussion paper notes that,

To deliver innovation, however, performance-based standards require effective engagement of planning participants (local governments, developers, applicants, design teams) to have a more active role.

In December 2023 we stated in our submission to the Tasmanian Department of Premier and Cabinet on the Development Assessment Panel (DAP) Framework Position Paper that,

Attempting to apply a “tick the box” approach to development applications may likely see those applications fail. Often sites can be small or topographically challenging. It is these development applications that will be among the situations that will most benefit from multi-disciplinary DAP.⁴

Minimum prescribed settings can be measured against set criteria or algorithm. In 2021 the then Victorian Department of Environment, Water, Land and Planning (DEWLP)⁵ moved to streamline

⁴ www.architecture.com.au/wp-content/uploads/Aust_Inst_Arch_submission_Development-Assessment-Panel-Framework_FINAL-1.pdf

⁵ Following the 2022 state election in Victoria there were changes to the machinery of government and planning and building controls are in the remit of the Victorian Department of Transport and Planning

the operation of their residential planning provisions in the Victorian Planning Provisions through their consultation, *Improving the operation of ResCode*⁶. The Institute similarly positioned in its response that there is a limitation to prescribing settings – which could work well in greenfield developments, but would always be problematic in infill development, and especially higher density development in the inner urban infill context.

Therefore, alternate pathways to assess development applications such as the DPAC’s proposed development assessment panels are a means to enable delivery of innovation by providing a more qualitative method to appraise applications against performance-based standards. A further enhancement to this could include multidisciplinary design review panels, which include suitably experienced practicing architects alongside other design and planning practitioners such as planners, landscape architects and urban designers.

The consideration of trade-off approaches as part of the assessment process is supported in-principle. The discussion paper notes that for present purposes, that all standards are equally weighted. However, to give effect to trade-offs, weighting of criteria may be important – and the weighting may need to be locally determined. For example, a precinct with prominent heritage attributes might provide a greater weighting to retention of heritage features. Trade-offs for uplifts might be used as an incentive to deliver affordable housing quotas beyond set inclusionary zoning requirements.

Survey Question 6: Feedback Opportunity

- Do you support further consideration of the development standards noted above?

The Institute supports further consideration of the development standards in this section, especially those that increase the density of residential areas, which cannot successfully occur alone without controls regarding plot ratio, landscaping, deep soil areas, environmental performance and other development standards that create liveable and sustainable communities. While it is helpful to look to other states for guidance, Tasmania should not solely rely on standards from outside jurisdictions if we can do better ourselves.

We note our previous response to Question 4 regarding the opportunity to identify and therefore set aside land for public open space for the long term.

Plot ratios are essential to ensure urban green space and tree canopy, together with deep soil areas, and allows for innovation rather than a prescribed building envelope. Specificity needs to be given to tree types suitable for deep tree planting in infill developments and especially apartments, with attention to future risks for building structure, underground services, and the rate of tree growth and canopy development. The outcome must reflect the intent. There are generally no ongoing mechanisms to monitor if landscaping has been appropriately managed, for example, if a tree has been maintained to enable it to attain its intended height and canopy, or in instances of vegetation dying.

Standards mandating the minimum provision of social and affordable housing in private developments are important and need to be developed. The requirement for a percentage of dwellings to be set aside for social and affordable housing is supported by the Tasmanian Chapter of the Institute.

⁶ <https://reform.planning.vic.gov.au/about-the-reforms/news/Improving-the-operation-of-ResCode>

The Institute also would like to iterate the importance of fences in residential development standards across all planning zones. Appropriate fence design can ensure the retention of local neighbourhood character, provide passive surveillance and safer communities. With the rise of the impenetrable steel front fences, we are losing the ability for this structure to contribute to the creation of visually appealing places and safe environments.

For larger scale developments, standards for contribution to improving the amenity of the local neighbourhood should also be considered, such as pedestrian networks, open or controlled access to green space or community-managed spaces and facilities.

The Institute notes that structure plans and neighbourhood design sit in the miscellaneous standards. Development must be supported by a holistic approach to urban and neighbourhood design. Local Area Objectives (or Desired Future Character Statements, as used in interim planning schemes) are important to guide development that is appropriate to the individual location and must be developed for all municipalities.

Better subdivision standards are crucial given the high proportion of greenfield housing that continues to be built. Subdivision design should involve urban planners and architects, who have the expertise to deliver the best outcomes for the communities (both people and the environment) who will inhabit these places and spaces, not civil engineers and surveyors alone. The imperative for subdivision should not only be driven by lot yield, but must place the highest importance on creating liveable, connected, healthy and sustainable communities.

Further to the three standards that are expanded upon in the discussion paper – including lot size diversity, roads and street blocks, and public open space – water sensitive design, benching and earthworks, are also important. Mechanisms for stormwater detention are expected, if not required for single dwellings and should equally apply to subdivision design. Associated landscaping can assist with water-sensitive urban design. Landscaping should also be a subdivision standard for both public open spaces, pedestrian networks and nature strips.

Subdivision standards should also include provisions for Indigenous nodes, corridors and ecosystems to enhance parks and wildlife diversity areas, as well as restore urban areas with low flora and fauna diversity due to patterns of settlement since colonisation.⁷ This would be undertaken through consultation with people with relevant cultural and landscape expertise to achieve outcomes that are beneficial for biodiversity and restore Indigenous ecosystems across urban areas.

Survey Question 7: Feedback Opportunity

- Do you support the inclusion of additional land use definitions in the SPPs, specifically those related to multiple dwellings, and visitor and worker accommodation?

The Institute supports additional land use definitions in the SPPs, as they relate to multiple dwellings, visitor and worker accommodation. The variance noted in definitions of dwelling types indeed requires more specificity, if the goal of future housing development in Tasmania is to produce more housing stock, with more diversity, and meet targets. It must also consider the provision of services and amenity to serve community needs and create vibrant communities and local hubs.

⁷ https://www.uia-architectes.org/wp-content/uploads/2022/03/20201027_uia_ifla_iec_n_website_plan_ar_tw_ar2.pdf

For example: In the *30 Year Greater Hobart Plan*, it states the need to build 30 000 new homes across the next three decades (p 4).⁸ The term ‘home’ and ‘dwelling’ is used interchangeably in this document, and there is no detail here as to whether these will be single or multiple, or within low or medium-density contexts or whether they are intended as long term housing or short stay accommodation. Further importance placed on defining dwelling types will ideally lead to more transparency as to what housing targets are being aimed for, and could also serve to encourage greater diversity in housing stock.

Our support for additional residential land use types aligns to our response to question 2 to ensure planning more assertively provides needed housing in response to the household and population characteristics such as household composition, age, and potential disabilities.

There must be proper residential land use provisions for short stay accommodation, whether this is tourist or commercial traveller accommodation. Similar issues prevail in the precinct of universities, TAFE campuses and large hospital for student and key healthcare workforce accommodation. Longer term success of Tasmania’s tourism and hospitality sector, especially around Hobart, also requires longer term housing of the sector’s workers in reasonable proximity having regard, like hospital staff, to their shift work outside of the 9 to 5 envelope.

Survey Question 8: Feedback Opportunity

- Which approaches do you think are suitable to the Tasmanian context?

The Tasmanian Chapter supports the three approaches in this section. Design codes are of particular interest, as they could help advance interest and investment in housing typologies that Tasmania needs more of, such as medium-density apartments. Codes need to ensure that innovation is supported and not stifled. Design review panels that include practicing architects could assist with assessment that is qualitative.

The Tasmanian Chapter looks forward to the release of the Medium Density Design Guidelines.⁹ A fit for purpose set of guidelines for Tasmania should ensure that Tasmania avoids the pitfalls of densification. In many respects, Tasmania’s currently low proportions of apartment dwelling stock provide a clean slate. Tasmania is faced with an opportunity to “do density well” from the outset.

Zoning changes, such as the implementation of a Residential Growth Zone would also be of great benefit, to streamline further residential development in areas that are currently zoned for different purposes and offer potential residential development sites.

Inclusionary zoning is also supported by the Institute, as it mandates the provision of social and affordable housing. There are various examples within Hobart of new medium-density apartments, which could positively contribute to the lives of people seeking affordable or social housing that are outside of an affordable range for these groups, or are seeking approval to become short-stay accommodation. Careful consideration of where people want to live should be considered, and inclusionary zoning should be included at all densities. Placing clear controls on how new buildings within certain zones can accommodate specific demographics appears to be a solution that could assist in mitigating these issues.

⁸ https://www.greaterhobart.tas.gov.au/__data/assets/pdf_file/0009/345717/30-Year_Greater_Hobart_Plan.PDF

⁹ Refer further to the Institute’s submission to the Medium Density Design Guidelines Discussion Paper in 2023: https://www.architecture.com.au/wp-content/uploads/Tas-Chapter-Response_Medium-Density-Design-Guidelines_29-August-2023.pdf

As mentioned in Question 3 + 4, Tasmania is falling short on targets because of a reliance on private development to take the lead. Redeveloping existing brownfield sites often requires multiple adjacent purchases, demolition of existing buildings and can be more difficult and expensive than greenfield sites to develop. Government-lead development should be utilised in these instances.

Survey Question 9 + 10: Feedback Opportunity

- Do you support the proposed assessment criterion for testing recommendations?
- What baseline criteria and measures would you suggest for consideration?

The Tasmanian Chapter supports the proposed assessment criterion for testing recommendations to Tasmania’s residential standards. The impact/difficulty matrix is a good assessment tool, and the more expanded criteria for testing recommendations appear robust and well-considered.

Current demand for a supply of single dwellings falls into the low impact/low difficulty corner of the matrix, which allows for high profit for developers. Well-designed, medium density housing in brownfield sites fall into the high impact/high difficulty corner of the matrix, and often have a low profit margin. This is where the Development WA model should be considered more closely if the Government truly wants change, as reliance on the private sector will not meet yield targets and is unlikely to deliver quality outcomes that benefit the whole of community.

Additional criteria which could be added to Table 8 (p. 31), include an extra point to “Both viable and deliverable”, which expands on the post-implementation phase. Gauging the success of a project over time would require periodic review with suitably qualified professionals. An extra point ‘12’ could address a review of the performance and suggestions for improvements or change, or for future delivery of similar projects. Importantly, this should seek feedback from stakeholders.

It is very positive to see that engagement of stakeholders is part of the methodology for testing recommended improvements. Local communities as stakeholders are necessarily important stakeholders. What is sometimes missed is that the engagement is often undertaken with only existing members of communities. Often community members will be resistant to change and seek only to keep things as they are.

However, when government policy and a broader voice is trying to address the issue of matters such as housing supply, then there are future community members, not yet residing in a location who do not have a voice. The Tasmanians currently forced to live in temporary accommodation, who are on social housing waiting lists, couch surfing with friends and family do not really have a voice about where they might live. Their views might help shape consideration about amenity, transport and planning and design code consideration that promotes community cohesion, economic participation, and social inclusion.

The same applies to key workers such as healthcare workers and hospitality workers or students who may provide important insights into developing better residential standards about residential communities in which they feel safe to walk. This is especially important at evenings and nights between work, home, and the local amenities they use. This includes attention to the overall neighbourhood quality created by design codes and with attention to matters such as building setbacks, activated and non-activated areas, pedestrian thoroughfares, secure bike parking, and street lighting.

The Institute appreciates the inclusion of the case studies document and considers all the examples to be worthy for consideration in Tasmania.

Thank you for the opportunity to provide feedback on this important document which has the potential for wide-scale impacts. Tasmania can create liveable, walkable, prosperous, diverse, innovative, and exciting cities, towns, and suburbs. Realising our potential requires appropriate growth and infill of existing settlements, while valuing and enhancing the unique character of place. Strategic coordination, planning, quality design and excellent built outcomes are the building blocks required to achieving this for all community, leaving no one behind.

We look forward to seeing this project develop. Please contact us if you would like to discuss any of the points raised further.

Kind regards,



Jennifer Nichols

Executive Director, Tasmanian Chapter
Australian Institute of Architects

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